

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VALTRUS INNOVATIONS LTD.

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v.

Case No. 2:23-CV-0443-JRG
LEAD CASE

AT&T INC., ET AL.

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**JOINT MOTION FOR ENTRY OF
SECOND AMENDED DOCKET CONTROL ORDER**

Plaintiff Valtrus Innovations Ltd. (“Valtrus” or “Plaintiff”) and Defendants Verizon Communications Inc., Cellco Partnership d/b/a Verizon Wireless, T-Mobile USA, Inc., T-Mobile US, Inc., Sprint Corp, (“Defendants”) (collectively, the “Parties”) hereby jointly move to amend the First Amended Docket Control Order [ECF 79] in order to extend the deadlines for Defendants to comply with certain claim construction-related deadlines, including to comply with Local Patent Rules 4-1, 4-2, 4-3, 4-4, and 4-5(a) and (b) of the Eastern District of Texas as set forth below:

Current Date	Proposed Date	Deadline
July 17, 2024	Aug. 7, 2024	Comply with P.R. 4-1 (Exchange Proposed Claim Terms)
July 29, 2024	Aug. 14, 2024	Plaintiff to narrow Asserted Claims to 90 total claims
Aug. 5, 2024	Aug. 21, 2024	Comply with P.R. 4-2 (Exchange Preliminary Claim Constructions)
Aug. 12, 2024	Aug. 28, 2024	Defendants to narrow prior art references to 15 prior art references per Asserted Patent
Aug. 28, 2024	Sept. 6, 2024	Comply with P.R. 4-3 (Joint Claim Construction Statement)
Sept. 25, 2024	Oct. 2, 2024	Comply with P.R. 4-4 (Deadline to Complete Claim Construction Discovery)
Oct. 2, 2024	Oct. 9, 2024	Plaintiff to narrow Asserted Claims to 50 total claims and a maximum of 10 Asserted Claims per Asserted Patent
Oct. 9, 2024	Oct. 16, 2024	Comply with P.R. 4-5(a) (Opening Claim Construction Brief) and Submit Technical Tutorials (if any)

Accordingly, the Parties respectfully request that the Second Amended Docket Control Order be entered. A proposed Second Amended Docket Control Order is submitted herewith.

Date: July 17, 2024

Respectfully submitted,

By: /s/ Claire Henry

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T-Mobile USA Inc., T-Mobile US Inc., and

Sprint Corp.

CERTIFICATE OF CONFERENCE

I hereby certify that Counsel for Defendants and Counsel for Plaintiff have complied with the meet and confer requirement in Local Rule CV -7(h) regarding this Motion. The Parties are in agreement and are seeking joint relief.

/s/ Claire Henry

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on July 17, 2024.

/s/ Claire Henry